UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SA MUSIC, LLC and WILLIAM KOLBERT,

Plaintiffs,

V.

APPLE INC., AMAZON.COM INC., AMAZON.COM SERVICES LLC, GOOGLE LLC, and CLEOPATRA RECORDS, INC.,

Defendants.

Case No. 20-cv-09633-LAK

STIPULATION FOR STAY AND [PROPOSED] ORDER

WHEREAS on April 30, 2020, SA Music, LLC and William Kolbert (together "Plaintiffs") filed the above-captioned lawsuit (the "Action") against Defendants Apple Inc., Amazon.com Inc., Amazon.com Services LLC, Google LLC, and Cleopatra Records, Inc., in the United States District Court for the Central District of California;

WHEREAS on November 17, 2020, the Action was transferred to this Court;

WHEREAS, Plaintiffs have reached a resolution in principle with a non-party that will resolve Plaintiffs' claims in this Action, in its entirety, as to all parties;

WHEREAS Plaintiffs require 30 days to document their written settlement agreement; NOW THEREFORE the parties stipulate to the following:

- 1. This action shall be stayed for a period of 30 days to allow Plaintiffs to draft and execute a settlement agreement; and
- 2. In the event that this Action is not dismissed within 30 days, the parties shall advise the Court of the status of their efforts to resolve this Action within 30 days.

IT IS SO STIPULATED.

DATED: January 15, 2021

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DATED: January 15, 2021

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DATED: January 15, 2021

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DATED: January 15, 2021

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[PROPOSED] ORDER

Pursuant to the parties' stipulation, it is so ordered.

Pursuant to the parties' stipulation, it is so ordered.

DATED: 1/18, 2021

THE HONORABLE/LEWIS A. KAPLAN

REPRESENTATION OF CONSENT OF OTHER PARTIES

As required under Rule 8.5(b) of the Southern District of New York's Electronic Case Filing Rules & Instructions, I represent that all parties consented to the filing of this stipulation for stay and proposed order.

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